

REPORT TO THE GOVERNOR

ON

JERSEY CENTRAL POWER & LIGHT COMPANY'S
AUGUST 2, 2002 STORM RESPONSE

February 20, 2003

REPORT TO THE GOVERNOR ON
JCP&L'S AUGUST 2002 STORM RESPONSE

TABLE OF CONTENTS

	<u>Page</u>
Executive Summary	i
I. Introduction	1
A. Description of the Storm	1
B. JCP&L's Overall Storm Response and Restoration	2
C. Investigation and Analysis	2
II. Tree Trimming	2
III. Utility Workforce - Restoration Crews	3
A. Extent of Damage and JCP&L's Restoration	3
B. JCP&L Workforce	3
C. Response Personnel (JCP&L Crews, Mutual Aid Crews & Independent Contractor Crews)	5
D. Collective Bargaining Unit Concerns	11
IV. Outage Management System and OEM	12
A. PowerOn System	12
B. OEM / Critical Needs Customers	13
V. Emergency Communications	15

TABLE OF CONTENTS
(CONTINUED)

	Page
VI. Public Relations	16
A. Customer Call Center Activity	16
B. Media Utilization and Customer Complaints	17
C. Water and Ice Distribution	17
D. Medical Facilities	18
E. Media	18
VII. Compliance with Prior Board Recommendations	19
A. Emergency Communications	19
B. Customer Communications	21
C. Operations and Workforce	21
VIII. Board Staff's Recommendations	21
Appendix A GPU/JCP&L New Jersey Call Center Comparison Charts	23
Appendix B Company Press Releases	25

REPORT TO THE GOVERNOR ON JCP&L'S AUGUST 2002 STORM RESPONSE

Executive Summary

On Friday, August 2, 2002, severe thunderstorms resulted in approximately 180,000 electric customer outages in JCP&L's Central New Jersey region. Approximately 40,000 customers were without electricity for over three days and the total restoration was not completed until five days after the storm. Governor James E. McGreevey requested the Board of Public Utilities President to direct Board Staff to conduct an investigation of JCP&L's restoration decisions and actions taken prior to, during and after the August 2 storm. This examination included written and verbal inquiries with JCP&L and interviews with local emergency management officials and union representatives. Board Staff's investigation identified concerns with JCP&L's storm response, and in the electric distribution system's overall reliability. Discussions with JCP&L resulted in a Stipulation and Agreement of Settlement (Stipulation),¹ a copy of which is attached. The Stipulation requires specific action to be taken by JCP&L to address Board Staff's concerns and is the best means for JCP&L to improve its storm response and system reliability. If an acceptable Stipulation was not reached, Board Staff was prepared to recommend that an Order to Show Cause be issued to determine why the Board should not direct JCP&L to take specific actions. The Stipulation avoids a potentially lengthy legal proceeding and focuses on necessary improvements that will be implemented by JCP&L. The report also includes recommendations that the Board should take with regard to all regulated electric utilities in the State of New Jersey. The major findings and recommendations of the Board Staff's investigation are summarized below.

Conclusions

1. **JCP&L had difficulty assessing the damage of the storm and deploying the necessary repair crews in a timely manner.** Our investigation found that:
 - JCP&L utilized 120 out of their 560 trained Hazard Responders, who play a key role in assessing storm damage.
 - JCP&L did not get sufficient repair crews into the field until the afternoon of August 5th. JCP&L reported difficulty in contacting and mobilizing its crews over the weekend.
 - JCP&L did not request mutual aid from other New Jersey utilities until 11:00 a.m. on August 3rd.
 - JCP&L did not reach out to its parent company, First Energy (FE), for assistance until 3:45 p.m. on August 3rd.
2. **Mutual aid from other utilities was not effective in decreasing the length of the outage.** When JCP&L requested aid, other electric utilities did not release crews for several days due to forecasts for continued high temperatures and a second storm for Monday, August 5th. The overall response to this storm event has identified some underlying issues with the mutual aid system that need to be addressed by the Board and all the utilities.

¹ The Stipulation was approved by the Board in its Order of February 20, 2003 (Docket EX 02120950)

3. **JCP&L did not compile a list of “Critical Care Customers” and provide it to emergency management personnel in each county and municipality it serves.** The Company also did not: develop a plan for contacting critical care customers; contact critical care customers that would be without power for more than 24 hours; and identify all customers in its service territory using private wells.
4. **JCP&L demonstrated notable improvement in the areas of emergency communications and certain aspects of Customer Relations,** including the Company’s ability to handle high call volumes, as compared with its past performance during other serious outages.
5. **Union officials raised several areas of concern that should be investigated further.** Union allegations include: a deterioration of union-management relations since the merger with First Energy, which has contributed to increased retirement rates; a significant decline in total staffing and field experience in key areas such as line crews and relay technicians; and a decline in the quality of company maintenance practices. The Company believes that, even with the loss of some positions, productivity and management improvements have enhanced their operations.

Recommendations

It is recommended that the Board issue an Order adopting the terms and conditions of the Stipulation and Agreement of Settlement between the Board and JCP&L, which would require JCP&L to take the following actions:

1. During a major event, defined as an incident that results in more than 65,000 customers without power for more than 24 hours, JCP&L shall have at least 200 hazard responders responding to the event within 8 hours, and 150 restoration crews responding within 12 hours, of notification by the PowerOn system.
2. Increase its New Jersey employment by at least 40 new full-time employees in various positions at the Company’s discretion, and maintain an average daily staffing level of 672 employees and contractors until the Board has taken action with regard to the Board Staffs’ focused audit or October 31, 2004 if the Board has not taken any action.
3. JCP&L shall engage the services of Michael Gaffney, an adjunct professor at Cornell University, to work with management and the Company’s unions to improve the existing management/union relationship.

In addition, the Board should direct Board Staff to:

1. Board Staff shall undertake a review and focused audit of the Company’s Planning and Operations and Maintenance programs and practices and, its compliance with the previous focused audit and Board regulations and applicable statutes.

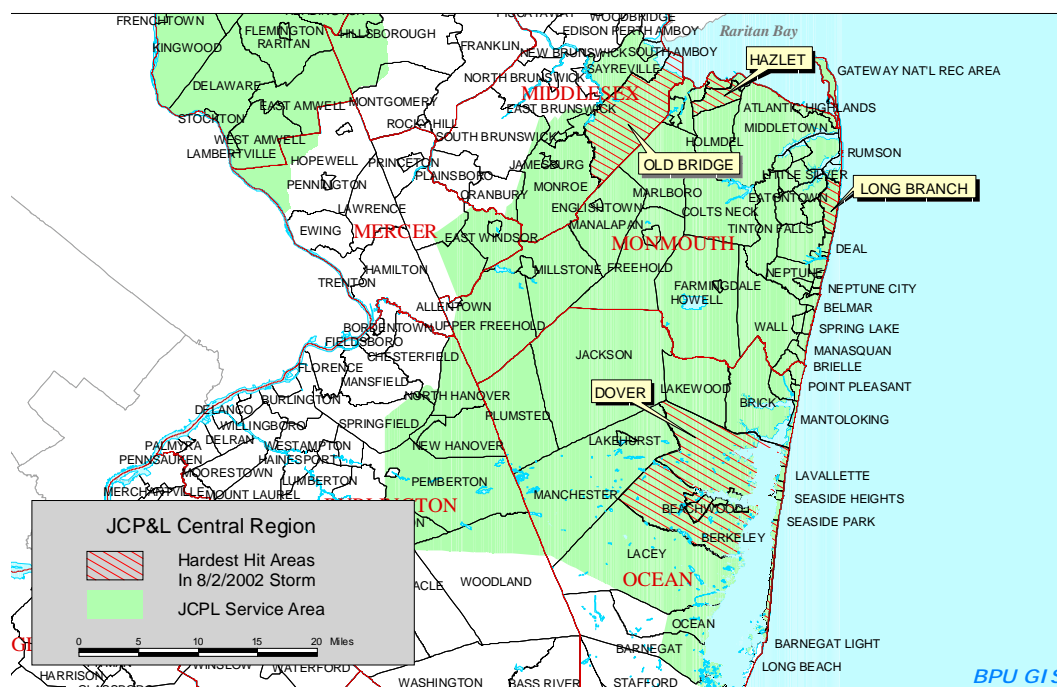
2. Establish an electric utility working group to evaluate the current mutual aid system and identify improvements that should be made to better respond to outages. The working group should address how to best respond to an existing emergency when further bad weather is predicted.
3. Work with utilities to re-evaluate the restoration process for critical electric customers in the context of disaster preparedness in conjunction with the Domestic Security Preparedness Task Force when shared workforce resources on a regional basis would be necessary to respond to the emergency.
4. Expedite the development of future tree-trimming standards for all electric utilities. A draft standard proposal should be prepared by July 2003.
5. Amend the appropriate Board regulations to effectuate the following:
 - Forward to the emergency management officials of each municipality and county that it serves, a listing of its "Critical Needs Customers" in that county or municipality. All Board regulated electric utilities should update this list semi-annually and send an updated copy to the aforementioned local and county EM officials. In addition, all Board regulated electric utilities should immediately (within one hour) upon request send the list to local and county EM officials via fax or hand delivery during or after an emergency situation.
 - All electric utilities should make available on their websites, information advising customers of the ability to register as a Critical/Special Needs Customer.
 - Contact any customer identified in its records as being a critical special needs customer during an outage lasting more than 24 hours, and advise them of the probable time of restoration of service.

REPORT TO THE GOVERNOR ON JCP&L'S AUGUST 2002 STORM RESPONSE

I. Introduction

A. Description of the Storm

On Friday, August 2, 2002, a major storm resulted in approximately 180,000 customer electric outages in Jersey Central Power and Light's (JCP&L's) Central New Jersey region. Severe thunderstorms with over 4,000 lightning strikes and high velocity "straight-line" wind gusts of 60 to 70 mph brought down massive tree limbs, and in some cases uprooted entire rows of trees. "[T]wo storms (one over Middlesex County, the other over Staten Island) merged as they moved south into Monmouth County. Their combined impact produced widespread wind damage. . . . Based on the amount of wind damage in Monmouth County, many locations saw wind gusts over 70 mph."² Hardest hit were JCP&L's Long Branch and Union Beach areas (See map, below). Monmouth County's Emergency Management Coordinator declared a countywide emergency at 5:00 p.m. on August 3, 2002.



² "Severe Weather Event: Friday, August 2, 2002", National Weather Service Forecast Office, Mt. Holly, NJ.

B. JCP&L's Overall Storm Response and Restoration

While JCP&L held over extra crews in anticipation of a possible thunderstorm, the extent of the wind and rain damage exceeded the Company's expectations. Due to forecasts for continued high temperatures and a second storm for Monday,³ other electric utilities held their crews on stand-by for potential outage response rather than releasing them to JCP&L for mutual aid. PSE&G, Rockland Electric, and Conectiv, sent some crews later in the weekend, at about the same time that FirstEnergy⁴ (FE) crews were arriving from Ohio and Pennsylvania. In the first 24 hours, the Company restored over 90,000 customers. However, complete restoration was not achieved until Wednesday evening, five days after the storm hit.

C. Investigation and Analysis

Because of concerns for the well-being of the citizens impacted by the storm, the Governor requested the Board of Public Utilities President to direct Board Staff to conduct an investigation of JCP&L's restoration decisions and actions taken prior to, during and after the August 2, 2002 storm. This report by Board Staff details its investigation undertaken in accordance with that directive. Board Staff's investigation identified concerns with JCP&L's storm response, and in the electric distribution system's overall reliability. Discussions with JCP&L resulted in a Stipulation and Agreement of Settlement (Stipulation),⁵ a copy of which is attached. The Stipulation requires specific action to be taken by JCP&L to address Board Staff's concerns and is the best means for JCP&L to improve its storm response and system reliability. If an acceptable Stipulation was not reached, Board Staff was prepared to recommend that an Order to Show Cause be issued to determine why the Board should not direct JCP&L to take specific actions. The Stipulation avoids a potentially lengthy legal proceeding and focuses on necessary improvements that will be implemented by JCP&L. The report also includes recommendations that the Board should take with regard to all regulated electric utilities in the State of New Jersey.

II. Tree Trimming

All regulated New Jersey electric utilities have reportedly complied with the Board's service reliability directives, including implementation of a four-year tree trimming cycle for all transmission and distribution line facilities, that were contained in its December 30, 1997 Order (Docket No. EX97080610). This practice was deemed necessary and prudent as trees were found to be a major cause of power outages. In an effort to enhance service reliability, Board Staff will continue discussions with the utilities as well as members of County Shade Tree Commissions, the International Society of Arboriculture and the Committee for the

³ The Weather Channel.

⁴ FirstEnergy is the parent company of JCP&L, the corporate successor to General Public Utilities (GPU).

⁵ The Stipulation was approved by the Board in its Order of February 20, 2003 (Docket EX 02120950)

Advancement of Arboriculture in order to promulgate future tree-trimming (i.e. vegetation management) standards for both transmission and distribution lines.

Pursuant to the Stipulation, JCP&L has agreed to file with Board Staff a report describing its tree trimming program and its compliance with the Board's previous orders concerning tree trimming on or before March 1, 2003.

Recommendation: Board Staff should expedite the development of future tree-trimming standards for all electric utilities. A draft standard proposal is expected by July 2003.

III. Utility Workforce - Restoration Crews

A. Extent of Damage and JCP&L's Restoration

The Company reported 1,029 trouble locations, with 4,700 trouble cases/problems. These included 412 poles and crossarms, 109 transformers, 730 primary line spans, 434 secondary line spans, 1,275 electrical devices (e.g. fuses, reclosers, etc.), 814 line (i.e. secondary service line drops) services to consumer homes, and 926 trees. Of the approximately 180,000 JCP&L customers in its Central Division that were without power, the Company restored electricity to approximately 120,000 customers in the first 52 hours. The total restoration took approximately 118 hours or five days. However, approximately 40,000 customers were without electricity for over three days, with the last customers restored by Wednesday evening, August 7.

B. JCP&L Workforce

A review of JCP&L's 10-year New Jersey workforce history since 1992 shows a significant downward trend in the level of line construction and maintenance personnel ("LC&M") for its Northern and Central New Jersey regions. The total number of 663 line employees in 1995 decreased to 425 in 2001 prior to GPU's merger with FE. Due to retirements during the post GPU/FE merger period, an additional reduction of 25 personnel resulted in 400 LC&M personnel remaining with JCP&L as of August 2, 2002 (see Chart "A"). This 40% decline in workforce occurred at the same time as a considerable growth in the JCP&L customer base. According to the Company, these positions are not eliminated, but at this time, it does not consider it necessary to fill them. The Company believes that, even with the loss of some positions, productivity and management improvements have enhanced their operations. The reduction in LC&M staff may have had an impact on the Company's ability to restore service, as well as its ability to perform routine maintenance.

In its Order dated October 9, 2001, Docket No. EM00110870, the Board conditioned its approval of the GPU/FE merger on the terms and conditions contained in the merger Stipulation agreed to by all involved parties. The pertinent workforce issues described in the Stipulation paragraphs of the Order included:

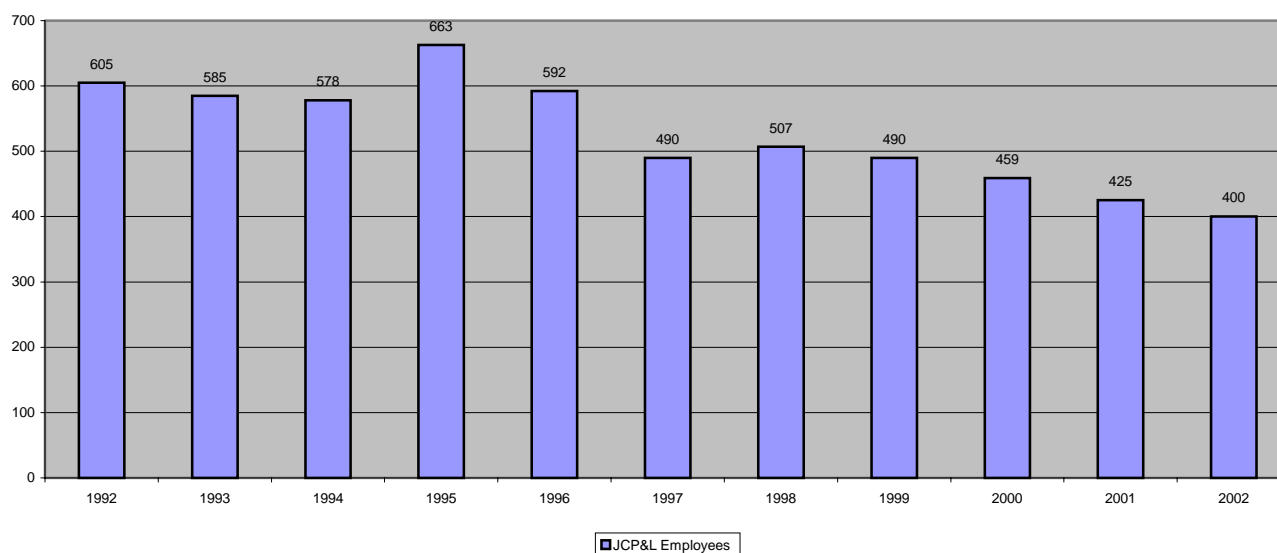
- 27: “First Energy shall honor the Memorandum of Agreement (“MOA”) contract extension with JCP&L’s bargaining unit employees (approximately 1,600 employees) that through October 2004 protects against involuntary layoffs and provides for increases in compensation and benefits. First Energy, to the extent deemed necessary by regional management, shall backfill, through employees and/or contractors, JCP&L’s regional service reliability employees who may retire or voluntarily resign through October 2004 so that appropriate staffing level is maintained to assure safe, adequate and proper service. Regional management shall maintain staff at district offices sufficient to maintain reliability and service in compliance with Board requirements and Orders.”

Pursuant to the Stipulation, JCP&L shall increase its New Jersey employment by at least 40 new full-time employees within planning, design and protection engineering, dispatching, relay testing, substation operations and maintenance, forestry, customer service and/or line operations and maintenance at the Company’s discretion. Such increase in employment shall take the form of new employees. JCP&L shall issue a monthly report to Board Staff detailing the progress of its efforts, and will use its best efforts to complete such hiring by September 1, 2003. JCP&L shall notify Board Staff if it is not able to meet this deadline, and may request an extension of time to meet this requirement. Board Staff shall not unduly withhold approval of this request. In order to accommodate normal attrition and other changes in employment levels over time, JCP&L shall also maintain staffing levels for the following job classifications and activities, over the period from March 1, 2003 through the termination of this commitment as set forth below, such that the average over such period of the daily number of employees and contractors shall be no less than 672 (plus any of the 40 employees noted above that are included in the following job classifications). This commitment as to staffing level shall terminate when the Board has taken action with regard to Board Staff’s focused audit referenced in Paragraph 8 of the Stipulation, provided that such commitment shall in any event terminate on October 31, 2004, whether or not the Board has taken such action.

- Cable Splicer
- Express Service Technician
- Line, Construction and Maintenance
- Line Inspector
- Underground Construction and Maintenance
- Underground Residential Distribution
- Street Light Work

CHART “A”

JCP&L LC& M Employees



C. Response Personnel - JCP&L Crews, Mutual Aid Crews, and Independent Contractor Crews

JCP&L bases its workforce requirements on a normal day-to-day workload, and weather conditions. This enables it to recover quickly (i.e. usually within 24 hours) from weather or other events that cause limited outages and minor or isolated damage. These workforce levels are not adequate to restore customers within 24 hours in every type of storm or outage, particularly when damage is extensive and there are widespread outages. Mutual assistance, in the form of foreign crews,⁶ affiliated FE companies, as well as outside contractors, plays a crucial restoration role. Pursuant to the Mid-Atlantic Mutual Assistance Program, member utilities agree to provide each other assistance at cost, which includes both direct and indirect costs. Wage rates, including overtime, are based upon individual labor contracts existing between each labor union and member utility. JCP&L reports that its Central and Northern regions allocate a combined \$4,000,000 for outside services in their annual storm budgets. By December 2002, the Company had spent \$3,500,000. However, this amount does not include the August 2 storm restoration cost which is yet to be determined by the Company.

The availability of foreign crews is dependent upon the supporting utility's own needs at the time they are requested. In previous reports and Board Orders, EX98101130 (December 16, 1998), and EA99070485 (May 1, 2000), Board Staff recommended that the utilities carefully consider the impact on reliability resulting from reductions in its skilled workforce and excessive reliance on mutual aid and outside contractors. Despite Board Staff's concerns, in 1998 JCP&L stated that staffing shortfalls could be addressed

⁶ Foreign crews are crews obtained from other electric utilities, e.g. PSE&G, Conectiv, PECO, Rockland Electric, etc.

by the use of contractors and outside aid. Board Staff also previously stated, in the Phase I Report of its Investigation of Electric Utility Outages of 1999 (Docket No. EX99100763, April 28, 2000), that reliance on contractors and outside aid is not in the best interest of the Company or its customers.

The storm first hit JCP&L's Northern Region on Friday, August 2, 2002, at 5:30 p.m. JCP&L's Central Region's first significant indication of the storm's severity occurred at 8:39 p.m. when multiple trips and recloses occurred on several distribution circuits. JCP&L opened its emergency command center on Friday at 9:30 p.m. At 11:00 a.m. on Saturday, August 3, 2002, JCP&L initiated the Mid-Atlantic Mutual Assistance Conference Call in order to acquire additional resources available from member utilities. At that time, JCP&L requested 30 crews, Baltimore Gas & Electric (BG&E) requested 50 crews, and PECO Energy Company (PECO) requested 30 crews. However, no crews were available. Utilities were reserving their crews to address existing as well as potential outages.

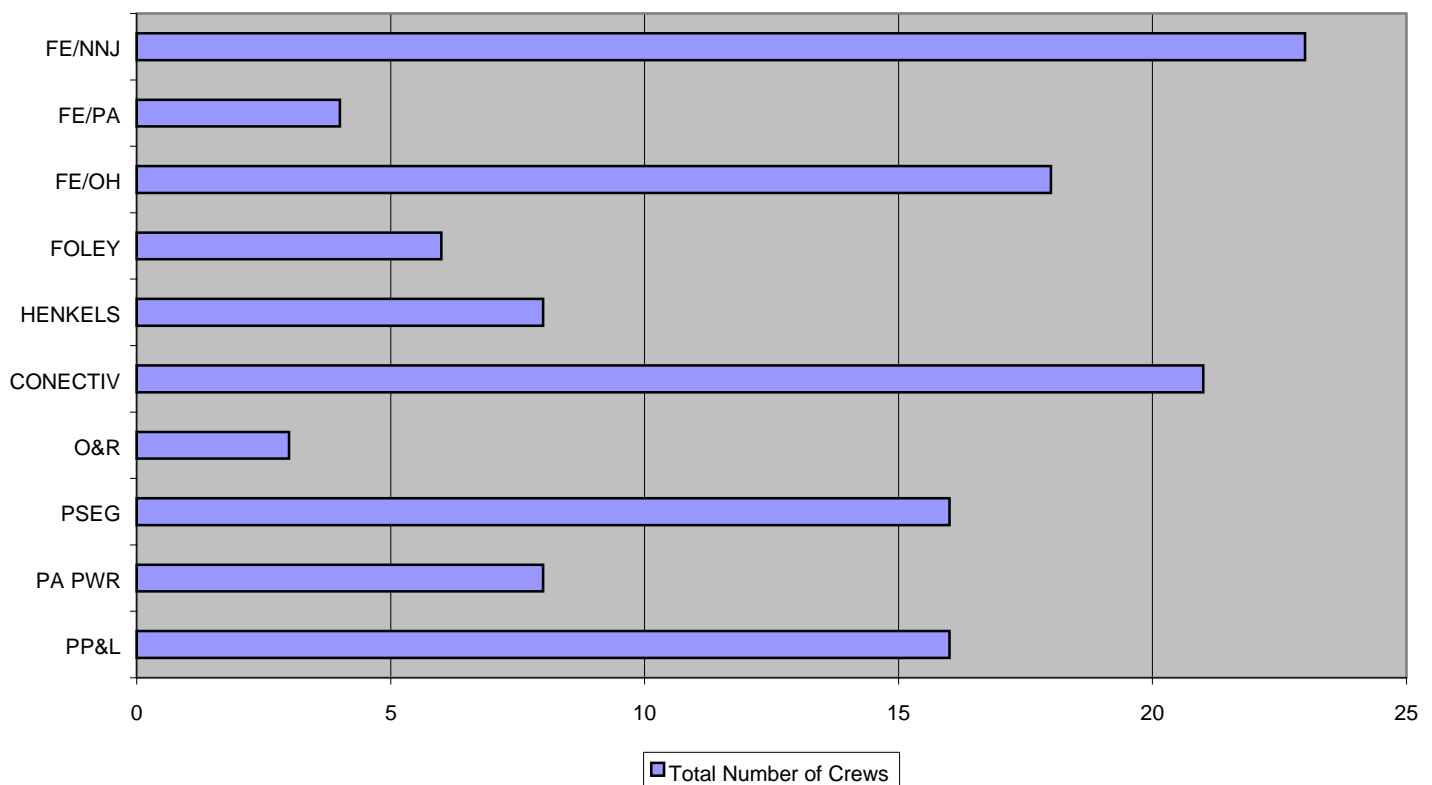
By midnight on Friday, August 2, JCP&L was aware that approximately 180,000 of its customers were without power. The Company did not initiate the Mutual Assistance Conference Call for another 11 hours. Prior to the initial mutual aid assistance call, JCP&L reached out to neighboring utilities for restoration assistance. Initial efforts to acquire foreign crews met with little success, as neighboring utilities were experiencing their own storm related problems or holding back crews in order to deal with potential outages. JCP&L contacted FE-Ohio at 3:45 p.m. on August 3. According to JCP&L, efforts made by the Company during Sunday night and Monday also failed as most utilities appeared to be holding their crews due to the potential of threatening weather for Sunday night and Monday, as well as issuances of heat advisories. JCP&L continued its mutual assistance requests through Tuesday, August 6, for foreign crews, and accepted any resources provided by other utilities. Overall, it appears that JCP&L made 9 calls for mutual aid at regular intervals, with the first call having been made at 11:00 a.m. on Saturday, August 3 and the last call being made at 11:00 a.m. on Tuesday, August 6. Foreign crews initially began reporting to JCP&L on Sunday, August 4, at approximately 5:00 a.m. From August 3 through August 4, JCP&L had 29 and 93 of its crews respectively working restorations. By Monday, August 5, approximately 56 hours into the restoration, only 83 foreign crews had reported. The utilities continued reserving crews due to the potential for threatening weather on Monday, August 5. At the same time, a heat-advisory was also issued for the area on Monday. Since the storm occurred at the beginning of a weekend, JCP&L experienced difficulty mobilizing all of its work crews. Once the normal workweek resumed on Monday, the numbers of restoration crews increased.

Due to the forecast of possible heat-related problems or summer thunder and lightning events, JCP&L held 22 crews over on Friday, August 2, in addition to its Express Service Technicians, in order to provide 24-hour 7-day coverage. At the height of the storm restoration efforts, there were 221 FE crews working in the field. This included 40 FE/Pennsylvania crews, 72 JCP&L Northern Region crews, and 109 JCP&L Central Region crews. The Company reported that additional foreign utility line crews assisted in

outage restoration efforts. The foreign crews included: 19 PSE&G, 17 Conectiv, 6 Orange & Rockland, 17 Pennsylvania Power & Light (PP&L), 19 Henkles & McCoy and 6 Foley crews (contractors). Chart “B” depicts the numbers of foreign crews assisting in the restorations. By utilizing only JCP&L central resources, 50 percent of JCP&L’s customers had been restored within twenty-four hours. Because of the confirmed length of outages, and JCP&L’s inability to secure additional crews, Board Staff made inquiries to other New Jersey utilities on Tuesday, August 6, at approximately 1:00 p.m., and was able to obtain additional crews.

CHART “B”

Foreign Crews by Company



JCP&L had requested 10 crews from Conectiv on Saturday at approximately 7:30 a.m., prior to the mutual aid call. Conectiv advised JCP&L that it could probably give 5 Conectiv crews and 5 of their contractor crews (Foley), but they wanted to check before making the commitment.

Upon re-assessing their crew situation, Conectiv concluded that no crews were available, as there were service problems that needed to be addressed. Conectiv then realized that 5 Foley contract crews that they thought were available had already left around 4 a.m. Saturday for Orange & Rockland, without notifying Conectiv. Orange and Rockland had 30,000 customers without power system-wide at that time and it had already contacted

Foley for any additional crews. Orange & Rockland later sent these contractors back to JCP&L by 6 p.m. on Saturday.

Chart “C” depicts JCP&L’s restoration efforts in terms of the total numbers of crews restoring service versus the percentage of customers restored. Chart “D” provides a breakdown of the FE, foreign, and contractor restoration crews.

Chart “C”:

JCP&L Storm Restoration

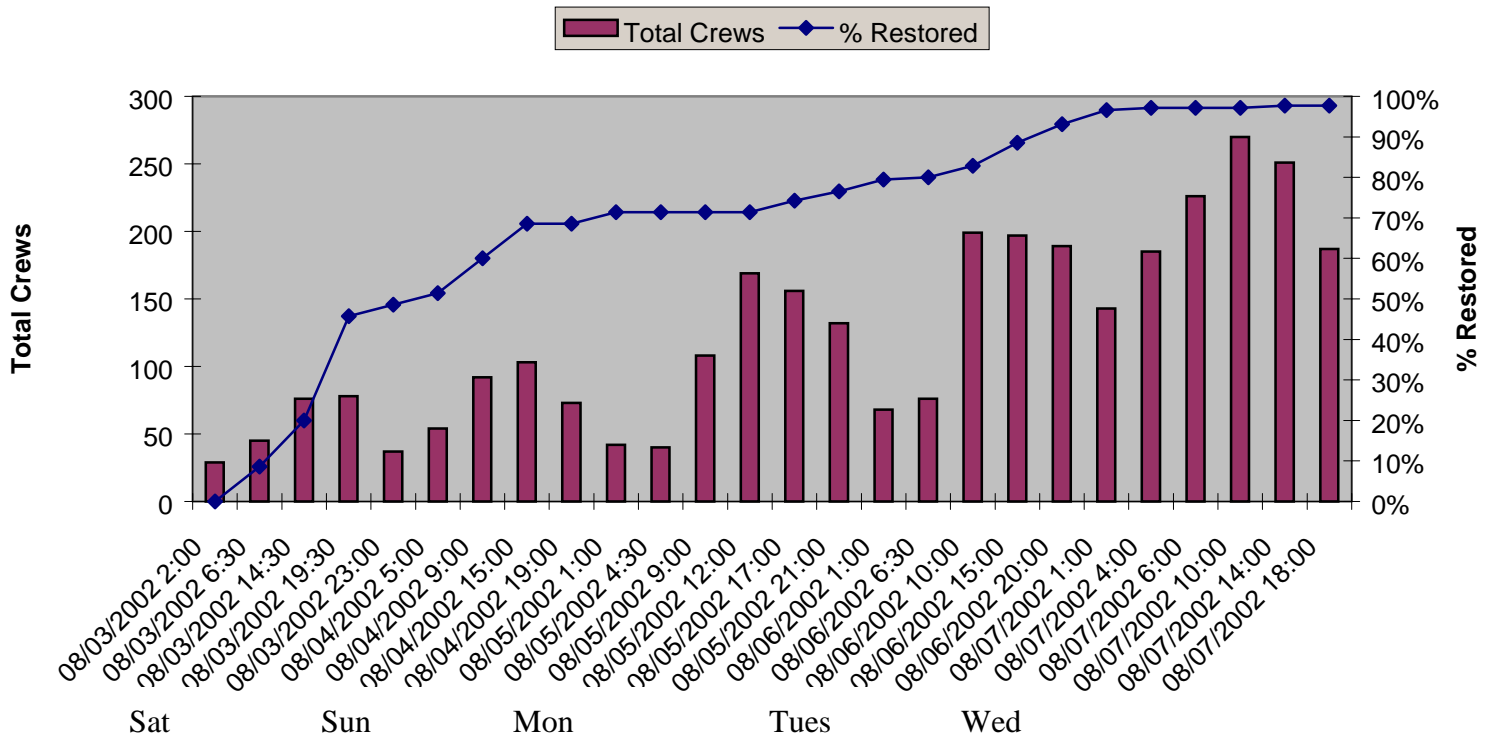
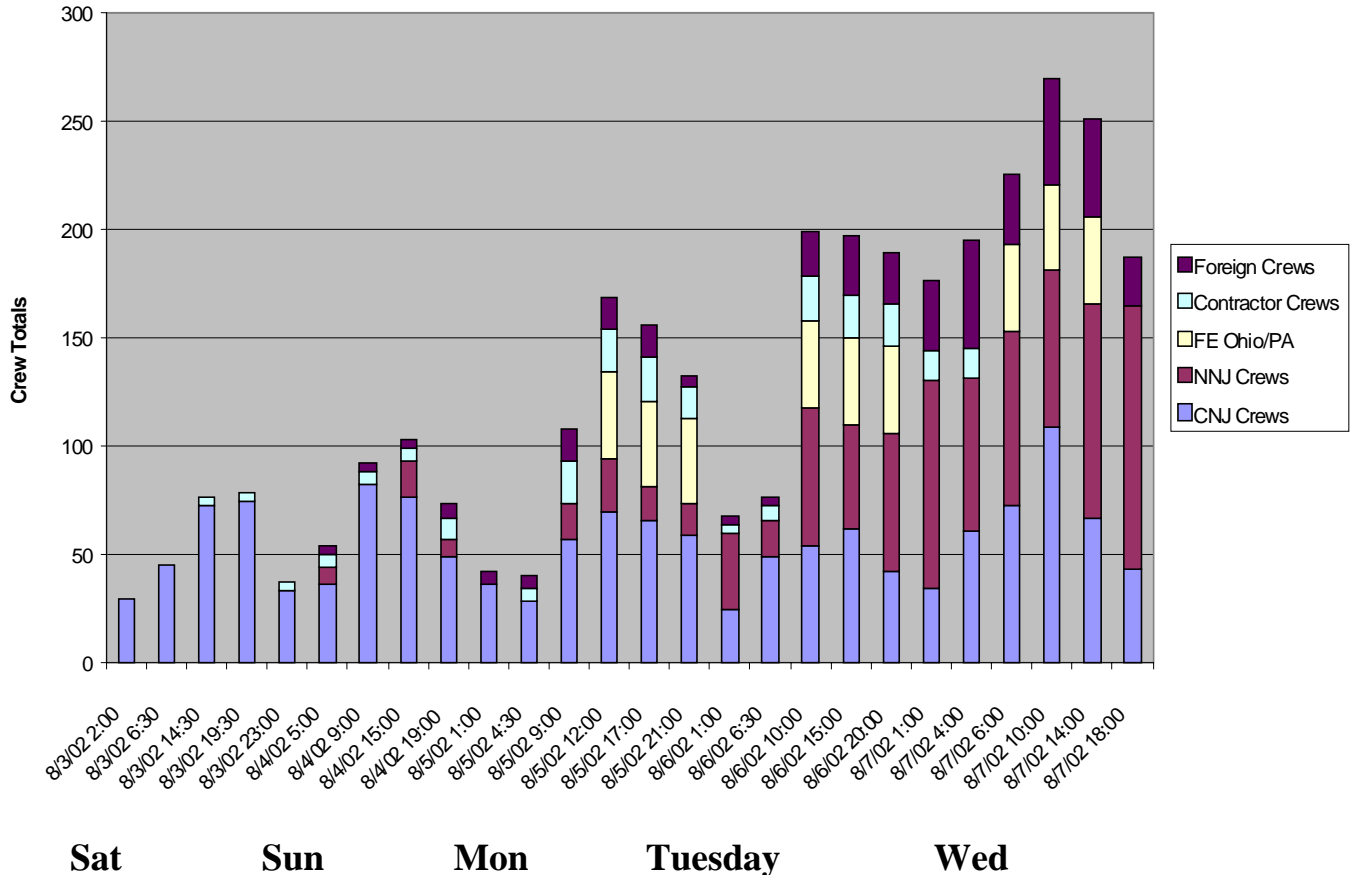


CHART “D”

Restoration Crew Composition



Recommendation: Board Staff should establish an electric utility working Group to evaluate the current mutual aid system, and identify improvements that should be made to better respond to outages. The work group should address how to respond to an existing emergency when further bad weather is predicted.

Since 1997, utility workforce issues have been addressed at length, in several Board Staff reports and Board Orders related to major storms and outage restorations. In its Order of December 30, 1997 (EX97080610), the Board directed JCP&L to supplement its line forces during storms by implementing an “Emergency Call-In Program for Retirees.” The goal of this program was to utilize the expertise of these persons to expedite the assessment of storm damage. During Board Staff’s inquiry into the circumstances of this outage, JCP&L indicated that this program was not necessary since the Company had increased the number of its Hazard Responders (formerly known as “Spotters”). JCP&L admits that assessment of the damage caused by the August 2 storm presented a significant challenge due to fallen trees and high water levels on roads, which made it difficult for Company personnel to assess storm damage.

Board Staff also has concerns with JCP&L's Hazard Responder resources not being fully utilized. Hazard Responders are trained to assess electric utility damage, and play an important restoration role by reporting the extent of storm damage back to the storm center so that crews can be dispatched for repairs. JCP&L currently has 560 trained Hazard Responders in New Jersey. The previously mentioned Order (No. EX97080610, December 30, 1997) directed JCP&L to increase its number of Hazard Responder from 270 (in 1997) to 405 in 1998. Board Staff notes that JCP&L reported using 120 Hazard Responders during the August 2 storm restoration. As with the line and construction crews, JCP&L had difficulty getting Hazard Responders to report to work after the storm started. Had damage assessments been more timely, restoration crews would have been more effectively dispatched, and therefore the overall outage duration would have been shortened.

Pursuant to the Stipulation, JCP&L has agreed that during a major event, defined as an incident that results in more than 65,000 customers in its franchise territory without power for more than 24 hours, JCP&L shall have, within its franchise territory, at least 200 hazard responders responding to the event within 8 hours, and 150 restoration crews responding within 12 hours, of the first customer outage reported by the PowerOn system. The obligation to maintain the above number of hazard responders shall continue until all trouble locations are spotted and reported, and the obligation to maintain the above number of restoration crews shall continue until restoration crews have been dispatched to all remaining trouble locations. Crews may include one, two or three persons, as appropriate for the job to be accomplished. A hazard responder or restoration crew shall be deemed to have responded to the major event when the hazard responder or restoration crew shall have reported to his/her/its designated work area on JCP&L property and shall be counted towards meeting JCP&L's commitments as set forth above even during rest periods. This requirement does not relieve the Company of its obligation to secure additional resources until restoration is finally achieved. Failure to comply with this requirement shall result in stipulated penalties of \$60 per hour, per person, for hazard responders when the level of hazard responders drops below 200 and/or \$170 per hour, per crew, for restoration crew members when the level of restoration crews drops below 150. Within 30 days of the final restoration, JCP&L shall submit to Board Staff a timeline showing the number of hazard responders and restoration crews, identified by employee number, and the times that they worked. After JCP&L has complied with these commitments for four major events, as defined above, or one year, whichever is longer, JCP&L may petition the Board to release it from this requirement.

Pursuant to the Stipulation, JCP&L shall undertake a study of staffing levels that would be appropriate for the long term provision of safe, adequate, and proper service considering technology and productivity improvements, best practices for maintenance operations, the use of contractors, benchmarking with other utilities, and growth in its service area. JCP&L shall retain the use of an outside consultant to assist it with the study. The consultant shall meet with JCP&L's unions to discuss any concerns they may have concerning such matters, and to obtain and share information concerning other New Jersey electric utilities. The study shall be completed and submitted to Board Staff no

later than July 1, 2003. This effort shall be coordinated with the work to be undertaken pursuant to Paragraph 8 of the Stipulation.

Pursuant to the Stipulation, JCP&L agreed to sponsor a Power System Institute training program for New Jersey similar to those that have been, and are being, established throughout FE's service areas. If such an Institute is not available to train new line staff for New Jersey beginning no later than September 30, 2003, then JCP&L shall restore its apprentice program and will keep such program in place until an Institute is established. JCP&L shall notify Board Staff and the Company's union by July 1, 2003 as to whether or not the training program will take place. In order to foster additional enhancements to the emergency response processes within New Jersey, JCP&L further agreed to provide \$125,000.00 to the county OEM offices within its service area for purposes of improving emergency management efforts.

D. Collective Bargaining Unit Concerns

At the initiation of Board Staff, officials and other members of JCP&L's bargaining unit were interviewed regarding the Company's storm response and maintenance practices. It is Board Staff's intention to review these concerns in detail with Company management and bargaining unit officials.

Board Staff inquiries regarding JCP&L's restoration efforts, in addition to other allegations which may have presented restoration challenges, by individuals requesting to remain anonymous, have brought to light issues which warrant further independent investigation.

Pursuant to the Stipulation, JCP&L agreed to engage the services of Michael Gaffney, an adjunct professor at Cornell University, to work with management and the Company's unions to improve the existing management/union relationship. By April 5, 2003, Mr. Gaffney shall provide to Board Staff an outline of the process for improving the union/management relationship. Mr. Gaffney will provide monthly progress reports for the first six months, and quarterly progress reports thereafter, to Board Staff beginning July 1, 2003. JCP&L will provide Board Staff with all recommendations made by Mr. Gaffney. For those recommendations that JCP&L decides to not implement, it will provide Board Staff with an explanation for its decision. Mr. Gaffney's services shall continue through December 31, 2004.

Recommendation: Board Staff should undertake a review and focused audit of the Company's Operations and Maintenance programs and practices, and its compliance with the previous focused audit and prior Board regulations and applicable statutes.

IV. Outage Management System and OEM

A. PowerOn System

JCP&L's computerized Outage Management System (OMS) is a product known as PowerOn. It is a predictive engine that provides an estimate of the number of customers affected, as well as the device that has caused the outage. The preliminary and final reports on this storm submitted by JCP&L differ as to the number and timeline of the customers affected. JCP&L's explanation of this difference is that the final report reflects the "official" customer outage data pulled directly from the PowerOn system after the event, while the information contained in the preliminary report reflects the "official" information released as the storm aftermath was occurring. According to JCP&L, the preliminary data was created by taking data recorded during the storm from real-time PowerOn reports and adjusting it only if other information was known to contradict it. In other words, if JCP&L knew that a certain circuit had been restored to service and PowerOn had not yet been fully updated to close-out the trouble locations on that circuit, JCP&L would report its best estimate of the number of customers affected, subtracting those customers from the total that it knew were back in service. The PowerOn system does not have the capability to automatically closeout trouble locations once the field workforce confirms that a circuit or a portion of a circuit has been restored. Instead, that function is left to the administrative staff. This process can take hours, depending upon how busy the person or persons assigned to the task are and the number of trouble locations. JCP&L reported that this storm generated over 1,000 trouble locations in its PowerOn system.

While Board Staff understands why different numbers are being communicated during the course of the restoration, (a "PowerOn" estimate versus a "real" estimate), these different numbers are confusing to Board Staff as well as to State and local emergency management officials, although they apparently did not directly impact the restoration effort. Board Staff recognizes that some adjustments may be necessary to the PowerOn system to improve the way trouble locations are closed out so that the restoration progress a utility has made in the field can be credited more quickly.

It should be a high priority for JCP&L to know how it is responding, for its own management of the storm event as well as its capability to communicate the extent of the remaining outages to local and State emergency management officials, including the BPU.

Pursuant to the Stipulation, JCP&L agreed to upgrade and enhance its PowerOn System by increasing the accuracy within the PowerOn outage prediction module, the flexibility for dispatching personnel to interpret outage data, and the data management system capabilities to enhance reporting abilities. JCP&L shall complete the upgrades and enhancements by August 31, 2003, and shall report to the Board concerning such efforts no later than September 30, 2003.

B. OEM / Critical Needs Customers

In the aftermath of the storm, then Acting Governor John Bennett, also a State Senator from Monmouth County, raised concerns that County OEM personnel did not have lists from JCP&L of the "Critical/Special Needs Customers" in Monmouth and Ocean Counties.

In Board Staff's "Electric Industry Storm Preparedness Report," dated December 16, 1998 and finalized March, 1999, under "Critical Needs Customers," JCP&L was directed by the Board to give top priority to customers identified as on life-support systems. The utilities were also directed to provide a plan within 30 days to contact any customer identified in its records as having a serious medical condition during an outage lasting more than 24 hours and advise them of the probable time of restoration of service. In the "Final Report Phase I – Investigation of Electric Utility Outages of July 1999," dated April 2000, Board Staff reported that the Company has a special customer relations team in charge of contacting special needs customers as well as hospitals. In the Final Report Phase I, the Board also directed that utilities shall, in an effort to assist customers, make this information available to county and municipal emergency management officials. The utilities were also directed to send a letter to each "Critical Needs Customer" advising them of the availability of these entities to offer assistance during emergency situations.

Board Staff in Discovery Data Request, Division of Customer Assistance-2, dated August 19, 2002, requested that JCP&L provide the following information: "Does JCP&L maintain a list of critical/special needs customers? If so, is the list available upon request to municipal and county OEM officials who wish to contact these customers?"

JCP&L, in its August 2, 2002 Storm Report, dated August 28, 2002, responded to Board Staff's data request as follows:

"Customers who have notified the Company of electrically powered life support equipment in their home are identified in the Company's Customer Care System. Individual requests for information to be extracted from the system are responded to during the normal course of business and include a review of customer information privacy issues."

Upon investigation, Board Staff has determined that JCP&L has not complied with the Board Order concerning "Critical Care Customers." Board Staff has verified with the Monmouth County OEM that they do receive lists of "Critical Needs Customers" from JCP&L. The Monmouth County OEM indicated that JCP&L typically sent them the list after the Company had updated it. However, the Monmouth County OEM also told Board Staff that the list was in need of updating. When questioned by Board Staff, JCP&L confirmed that the list had to be updated. Moreover, upon questioning, JCP&L admitted to Board Staff that it has no record of or plan in place for sending these lists out to the counties and municipalities that it serves. In addition, JCP&L did not contact the approximately 1,474 "Critical Needs Customers" that were without service for 24 hours.

Board Staff reiterates that the original premise behind this recommendation is still valid: that it would be an aid to county and municipal emergency management officials to know if an area that is experiencing an outage contains any "Critical Needs Customers," and that they be contacted if an outage will last for more than 24 hours.

Pursuant to the Stipulation, JCP&L agrees to immediately (within one hour), upon request, send its Critical Care Customer lists to the emergency management officials in each county and municipality in its service territory. JCP&L also agreed to provide a bill insert, approved by Board Staff, to all customers by June 1, 2003, and semi-annually thereafter, requesting customers to update information and confirm status as a critical care customer. The Company will provide the list of critical care customers within its service area to all county and municipal OEM offices on a semiannual basis. The Company also agreed to put in place a process to send an Interactive Voice Response (IVR) message to, or otherwise to call, all critical care customers if their power is expected to be out for more than 24 hours.

Recommendation: Board Staff should revise the appropriate regulations to require all electric utilities to forward to the emergency management officials of each municipality and county that it serves a listing of its "Critical/Special Needs Customers" in that county or municipality. This is an issue of public health and safety.

Recommendation: Board Staff should revise the appropriate regulations to require all electric utilities, to update the Critical Care Customer list semi-annually and send an updated copy to the aforementioned local and county EM officials.

Recommendation: Board Staff should revise the appropriate regulations to require all electric utilities to make available on their websites information advising customers of the ability to register as a Critical/Special Needs Customer in their semi-annual bill inserts.

Recommendation: Board Staff should revise the appropriate regulations to require all electric utilities to contact any customer identified in its records as being a critical special needs customer during an outage lasting more than 24 hours, and advise them of the probable time of restoration of service.

Board Staff notes that the Division of Reliability and Security Staff is in the process of re-evaluating the restoration process for critical electric customers in the context of disaster preparedness in conjunction with the Domestic Preparedness Security Task Force. A more in depth determination will be made regarding the most effective application of shared workforce resources within an inter-utility and regional basis. This will address the issue of how utilities contribute or execute their obligations under mutual aid compacts. This will be applicable to all electric utilities.

Recommendation: Board Staff should work with utilities to re-evaluate the restoration process for critical electric customers in the context of disaster

preparedness on behalf of the Domestic Security Preparedness Task Force when shared workforce resources on a regional basis would be necessary to respond to the emergency.

V. Emergency Communications

On Saturday morning, at approximately 12:45 a.m., after the initial onslaught of the storm, JCP&L contacted the Board's Emergency Management Staff to report initial estimates of outages. This information was conveyed to the Director of the Division of Reliability and Security, who contacted the Board President. JCP&L opened its Storm Room in Allenhurst, Monmouth County an hour into the storm on Friday evening at 9:30 p.m. By Saturday morning, Board Staff had opened a continuous line of communication with JCP&L and the NJOEM. Board Staff was dispatched to JCP&L's Storm Room, and maintained a presence there through to Tuesday, August 6. Additionally, on Saturday, August 3, the Board's Division of Reliability and Security Director convened a "strategy meeting" at the Storm Room with representatives of the State Police Emergency Management and the County of Monmouth Emergency Management teams.

As part of its assessment, Board Staff attended JCP&L's Annual Storm and Emergency Electrical Outage Recovery Seminar for Municipal Emergency Management Coordinators and Public Safety Officials held on October 10, 2002 in Eatontown. As one of their requests, local emergency management officials asked that JCP&L accelerate its cut-and-clear procedures (e.g. send out crews to cut down damaged lines or remove parts of trees that are in contact with a line) so that other tree crews such as those from a local Department of Public Works (DPW) can remove the debris from the street for emergency vehicles to pass through as well as alleviate the need for police to "baby-sit" these areas. JCP&L responded that the Company must first identify the most serious hazards, safeguard those areas, and dispatch crews in a staged restoration effort; however, it agreed that it would be helpful to accelerate cut-and-clear activities where possible. The Company also indicated that it is working to assess damage in six (6) hours or less, in order to determine what equipment and crews are needed.

Additionally, local emergency management officials indicated that crews in some instances gave residents conflicting information from that which the police and fire officials, and even newspapers had conveyed. The Company agreed that it will expend additional time to make improvements in this area

Pursuant to the Stipulation, JCP&L agreed to report to Board Staff, no later than July 1, 2003, with regard to its continuing efforts to communicate to emergency management officials in affected areas regarding better estimates of restoration.

Board Staff notes that there were also emergency management officials at the seminar who were pleased with JCP&L's communications, and the number of fax updates they received. For the most part, feedback from the Emergency Management community was positive as this scheduled annual meeting turned into a forum to discuss the strengths and weaknesses of JCP&L's performance in response to the August 2nd event. The Monmouth County Office of Emergency Management Coordinator expressed strong satisfaction with JCP&L's efforts and overall

cooperation. Therefore, from all of the foregoing, Board Staff concludes that JCP&L's emergency communications appeared to work well in general. JCP&L has shown significant improvement in communicating with local and emergency management officials since the 1999 outage event.

VI. Public Relations

A. Customer Call Center Activity

In compliance with the Board's Orders resulting from the 1998 Labor Day Storm and July 1999 Outages, Docket Nos. EX98101130 (December 16, 1998) and EX99100763 (April 28, 2000), specifically recommendations 9, 10, 13, 14, 15 and 16, JCP&L has improved its customer call center reporting ability. Recommendation 9 directed utilities to update the message module on their voice response unit with current information, while recommendations 10 and 13 directed that in the case of adverse weather conditions that negatively impact the utilities' transmission and distribution systems, utilities are to have adequate staffing levels to expedite answering of calls and to handle the volume of calls anticipated. Recommendation 14 stated that utilities are to ensure that call center management receive an accurate assessment from operations management as to the service problems as well as efforts being made to restore service to customers. Recommendation 15 directed that utilities with multi-state call centers be able to differentiate the calls by state received in the call center for reporting to the Board, and recommendation 16 stated that each utility shall make improvements to its call center statistics tracking systems and procedures to provide more accurate information to the Board.

In addition, with the benefit of also utilizing its Pennsylvania call center, New Jersey consumers were able to contact the Company to obtain status reports on restoration of service and receive updated information from the Company's internal voice response unit. For example, the average speed of answer was reduced from a high of 164 seconds during the July 1999 storm to a high of 57 seconds during the August 2, 2002 storm. There was also a significant reduction in the call abandonment rate from a high of 14% in July 1999 to 1% during this outage. (See Charts 1 & 2 in Appendix A).

The customer service centers began experiencing an increased call volume on Friday evening, August 2. (See Chart 2 in Appendix A). In response, the Company used its internal voice response unit to assist the customer service center representatives in gathering outage information and providing customers with restoration updates. JCP&L reported that although available, it was not necessary to direct calls to 21st Century, an outside vendor utilized by the Company during situations resulting in heavy call volumes. As noted in its report dated August 14, 2002, JCP&L also used other strategies to handle the increased call volumes. These strategies included increasing the level of 24-hour staffing with Pennsylvania and New Jersey call center and corporate personnel at the service centers, posting special messages on the Company's automated line to avert nonessential calls and reassigning personnel from other areas to assist with outage calls.

Additionally, JCP&L was able to provide a breakdown of the emergency/911 calls received with the new call center system's call tracking capability. (See Chart 3 in Appendix A).

B. Media Utilization and Customer Complaints

The Board received 56 service disruption complaints from customers throughout the August 2-7 outages, compared to 161 complaints during the 1999 storm, which is reflective of JCP&L's improved customer service and customer outreach efforts. Pursuant to recommendations 7 and 8 in Docket No. EX99100763 (dated April 28, 2000), the Company utilized various media outlets to keep customers abreast of its service restoration progress. Recommendation 7 directed that in the event of telephone failure, the utilities increase their use of media to compensate for customers' inability to obtain information from the utilities directly by phone. Recommendation 8 directed that each utility take additional steps to advertise its emergency numbers prior to storms; for example, by the use of radio or Internet, to educate customers in advance as to where they may turn to obtain detailed outage status updates. In compliance with this recommendation JCP&L's website contains storm preparedness information and the emergency phone numbers to call in the event of a storm.

Recommendation 9 (Order dated April 28, 2000, Docket No. EX99100763) directed that each utility update the message module on its Voice Response Unit (VRU). JCP&L updated its VRU message and provided updated information to its customer representatives every 4 hours, with further updates taking place if information changed outside of the 4-hour increments. Pursuant to Recommendations 10, 13 and 14, as previously set forth, the Company's improvements over the past 3 years in the areas of customer service and call center operations, resulted in better customer awareness and less customer confusion. Customers were afforded easier access to Company representatives who were more knowledgeable of the situation at hand than the representatives were in 1999.

C. Water and Ice Distribution

In the Board's Order for Docket No. EX98101130, dated December 16, 1998, paragraph 15 directed each utility, including JCP&L, to identify those areas of its service territory in which customers using private wells were in jeopardy of losing their water supply during an electric outage. The utilities were also directed to be aware of these customers and direct them to alternative water sources in conjunction with local municipal OEMs. In addition, the utilities were ordered to assist in the development of a plan in conjunction with municipal officials, to refer customers to local ice and dry ice vendors in areas that will be without service for more than 24 hours. JCP&L reported that it has identified the fact that there are private wells scattered throughout its service territory. Because of this, the Company provides ice and water for any event that is expected to exceed 24 hours, which is accomplished through the county and local OEMs with communications via notices to media outlets and on its VRU. JCP&L issued press releases advising customers of the availability of ice, dry ice, and water. According to JCP&L's

preliminary report dated August 14, 2002, the Company provided bottled water and ice to customers affected by outages that were estimated to last 24 hours or longer. Bottled water and ice was distributed by Leisure Time Ice in Raritan, Shop Rite parking lot in West Long Branch, and at the Dover Township Police Department. The Company also reported that 140 cases of gallon jugs of water, 42 cases of 2-1/2 gallon jugs of water, 70 cases of 1 liter bottles of water and 2,682 bags of ice were distributed to its customers from August 2-7, 2002. Board Staff's conversations with Monmouth County OEM indicated that it was satisfied with JCP&L's distribution locations and publicity surrounding the distribution centers.

Pursuant to the Stipulation, JCP&L agreed to provide a bill insert, approved by Board Staff, to all customers by June 1, 2003, and annually thereafter, seeking to identify those customers who depend on a private well for drinking water. The Company will update this list annually and provide to all county and municipal OEM offices within its service area. The Company also agreed to put in place a process to send an IVR message to, or otherwise to call, customers with private wells if their power is expected to be out for more than 24 hours informing them of where they may get water and ice.

D. Medical Facilities

JCP&L reported that 5 hospitals in the region were without power from the weather on Friday, August 2, and the Company was in contact with those hospitals and restoration efforts on their behalf began immediately. All hospitals were restored between 9:50 p.m. Friday night and 2:50 a.m. on Saturday morning August 3. It appears that the Company gave appropriate priority to hospitals during this event. JCP&L made a concerted effort to return service to hospitals in an expedited manner. This is evidenced by the fact that electric service was restored to all hospitals within a 5-hour period.

E. Media

JCP&L advised Board Staff that as the severity of the storm was an unexpected event, no prior advertising was undertaken. However, in its Preliminary Report the Company reported that beginning August 2nd, the Region's Media Relations representatives began fielding inquiries regarding the storm's progress and the Company's efforts. JCP&L provided around-the-clock staff coverage to handle news media inquiries. The group handled a total of 252 media inquiries from August 2nd through August 7th including live on-air interviews and taped updates for radio stations, newspapers and television. In addition, the group issued nine press releases during the event beginning Saturday, August 3rd at 7:30 a.m. and concluding on August 6th at 2 p.m., providing storm restoration updates to designated media outlets, legislative and municipal officials. These efforts were put forth by the Company to ensure timely communications with its customers, as well as being in constant communications with state and local officials.

JCP&L advised its customers of services available, i.e., water, dry ice and ice, through county OEMs, and by proactively notifying area media outlets. The Company issued press releases containing information on the outages and restoration through a myriad of

media venues in an effort to keep customers informed on the specifics of the outages, where to go to obtain various services and the status of restoration. This enabled customers to receive updated information, including information on such developments as the NJ Chapter of the American Red Cross opening a cooling center for customers needing relief from the heat or other services on a frequent basis. Appendix B contains copies of the Company's press releases as well as a list of the media outlets utilized by the Company. Communication was also maintained with the police departments in the affected areas who were provided with current information to relay to all critical care customers who contacted them.

VII. Compliance with Prior Board Recommendations

The Board has conducted a number of previous investigations instigated by severe weather events over the past few years. Some of these investigations have focused solely on JCP&L itself, while others have included the entire Board regulated electric industry in New Jersey. As a result of these investigations, Board Orders have been issued which contain recommendations and directives. Some of these are relevant to the situation JCP&L faced as a result of the August 2, 2002. Below is a listing of pertinent Board Orders and Board Staff's evaluation of JCP&L's compliance with them.

A. Emergency Communications

- 1) In the Board Order in Docket No. EX97080610, dated December 30, 1997, JCP&L was ordered to submit to the Board a comprehensive Communications Plan to improve the Company's ability to accurately assess restoration needs, update information provided to call centers, provide outage status messages and improve call-backs to emergency services personnel (e.g., police, fire and public safety officials) and provide customers with more reliable outage restoration information.

In addition to complying with the County and State communication protocols, and as part of the Board ordered implementation of an Outage Management System (OMS), JCP&L has complied with these requirements of the Order. JCP&L's OMS became operational in December 1999.

- 2) In the Board Order in Docket No. EX98101130, dated December 16, 1998, each electric utility was ordered to conduct at least one Storm Response "drill" annually with the participation of the local Office of Emergency Management (OEM) and submit documentation.

Board Staff has observed the annual storm drills that JCP&L has conducted and concluded that the Company has complied with this portion of the Order.

- 3) The Board Order in Docket No. EX98101130, dated December 16, 1998, ordered each electric utility to implement a comprehensive communications plan, which contains guidelines for emergency situations such as this storm. The potential for

an emergency command center consisting of a special bank of phones, staffed with knowledgeable representatives from the affected areas, was to be reviewed.

When Board Staff responded to the August 2, 2002 Storm, they were situated in JCP&L's Central Region Storm Center in Allenhurst, NJ. JCP&L appeared to have a reasonable amount of personnel at the Storm Center. The Center is equipped with computers, telephones, and televisions. JCP&L also provided documentation to public officials it contacted as a result of this storm.

- 4) The Board Order in Docket No. EX98101130, dated December 16, 1998, ordered each electric utility to give "live wire" conditions top priority in the restoration process and directed utilities to try to alleviate these situations as quickly as possible.

During the restoration process, Board Staff observed that within JCP&L's PowerOn system, live wire conditions are grouped separately and receive expedited priority handling. That is not to say that all live wire conditions were remediated expeditiously in this storm. There comes a point where the magnitude of the damage outstrips the utility's resources in terms of line crews and tree crews. This point was reached very early on in the storm restoration process for this storm. The recommendation to increase the use of Hazard Responders should yield some improvement in this area by getting a greater number of trouble locations prioritized earlier. However, problems can only be solved by assessing the overall damage earlier and getting more crews in the field faster.

- 5) In Board Staff's "Electric Industry Storm Preparedness Report" dated December 16, 1998 and finalized March, 1999, under "Critical Needs Customers," JCP&L was directed by the Board to give top priority to customers identified as on life-support systems. The utilities were also ordered to implement a plan within 30 days to contact any customer identified in its records as having a serious medical condition during an outage lasting more than 24 hours and advise them of the probable time of restoration of service. This is in addition to the requirement at N.J.A.C. 14:3-7.12(a)3, which directs utilities, on a semi-annual basis to "solicit information from their residential customers in order to determine the presence of life-sustaining equipment" at the customer's home. In the "Final Report Phase I – Investigation of Electric Utility Outages of July 1999" dated April 2000, Board Staff reported that the Company has a special customer relations team in charge of contacting special needs customers as well as hospitals. In the Final Report Phase I, the Board also directed that utilities, in an effort to assist customers, make this information available to county and municipal emergency management officials only. The utilities were also directed to send a letter to the "Critical Needs Customers" advising them of the availability of these entities to offer assistance during emergencies. The Company has recently provided this information.

- 6) In Docket No. EX99100763, dated April 28, 2000, the electric utilities were ordered to follow the Communications Model for Emergency Response Activities as delineated in the Board Order.

Board Staff have had several occasions to invoke the Communications Model for Emergency Response Activities since it was formalized in the Board Order. When requested, JCP&L has manned the State Emergency Operations Center along with Board Staff and followed the communications protocols regarding County OEMs. JCP&L appears to be in compliance with this recommendation.

B. Customer Communications

In reviewing the information submitted by JCP&L and conducting its own investigation along with considering the complaints received in the Division of Customer Assistance, Board Staff determined that JCP&L followed the directives contained in prior Board Orders and Reports regarding customer communications. There were significant improvements in the Company's call center operations as well as utilization of media outlets to provide accurate and updated information to customers. The 56 complaints received by the Board during the August 2-7 storm event were less than the 161 received during the July 1999 heat wave.

C. Operations and Workforce

In November 2000, the Board retained Schumaker and Company to review JCP&L's implementation of certain critical Phase Two directives for New Jersey's four electric utilities contained in Board Order No. EA99070485 (May 1, 2000). Schumaker worked closely with, and at the direction of, Board Staff in reviewing the implementation of the Phase II recommendations and issued its final report on March 14, 2001. The Board in its Order of June 6, 2001 (Docket No. EX99070483) accepted Schumaker's final report. Critical areas reviewed for JCP&L included pre-merger workforce adequacy, the Company's Restoration Improvement Plan, and Customer Average Interruption Duration Index (CAIDI) reporting as well as inspection and maintenance programs and practices for transmission and distribution. Supervisory Control and Automatic Data Acquisition (SCADA) and lightning protection plans were also reviewed. The Schumaker review determined that JCP&L was complying with the Board's critical Phase Two recommendations.

VIII. Board Staff's Recommendations

Board Staff recommends that the Board issue an Order adopting the Stipulation attached hereto as its own.

In addition, Board Staff recommends that the Board direct Board Staff to take the following actions:

1. Expedite the development of future tree-trimming standards for all electric utilities. A draft standard proposal is expected by July 2003.
2. Board Staff shall undertake a review and focused audit of the Company's Planning and Operations and Maintenance programs and practices and, its compliance with the previous focused audit and Board regulations and applicable statutes.
3. Establish an electric utility working group to evaluate the current mutual aid system, and identify improvements that should be made to better respond to outages. The work groups should address how to respond to an existing emergency when further bad weather is predicted.
4. Work with utilities to re-evaluate the restoration process for critical electric customers in the context of disaster preparedness in conjunction with the Domestic Security Preparedness Task Force when shared workforce resources on a regional basis would be necessary to respond to the emergency.
5. Amend the appropriate Board regulations to effectuate the following:
 - Forward to the emergency management officials of each municipality and county that it serves, a listing of its "Critical Needs Customers" in that county or municipality. All Board regulated electric utilities should update this list semi-annually and send an updated copy to the aforementioned local and county EM officials. In addition, all Board regulated electric utilities should immediately (within one hour) upon request send the list to local and county EM officials via fax or hand delivery during or after an emergency situation.
 - All electric utilities should make available on their websites information advising customers of the ability to register as a Critical/Special Needs Customer.
 - Contact any customer identified in its records as being a critical special needs customer during an outage lasting more than 24 hours, and advise them of the probable time of restoration of service.

GPU/JCP&L NEW JERSEY CALL CENTER COMPARISON CHARTS**CHART “1”****STORM OUTAGE DATA - 1999**

DATE	FRI. 7/2	SAT. 7/ 3	SUN. 7/4	MON. 7/5	TUES. 7/6	WEDS. 7/7	TOTALS
Outage Calls Received	1,490	1,210	12,932	55,121	64,677	7,368	142,798
ASA (seconds) (Average Speed of Answer)	94	77	164	148	46	33	94.7
Staffing	41	21	19	49	269	141	N/A

CHART “2”**STORM OUTAGE DATA - 2002**

DATE	FRI. 8/2	SAT. 8/ 3	SUN. 8/4	MON. 8/5	TUES. 8/6	TOTALS
Outage Calls Received	9,818	23,724	10,830	6,832	4,902	56,106
ASA (seconds) (Average Speed of Answer)	25	57	7	23	11	24.6
Staffing	28	81	89	141	107	N/A

APPENDIX A**CHART “3”****911 CALLS**

DATE	FRI. 8/2	SAT. 8/3	SUN. 8/4	MON. 8/5	TUES. 8/6	TOTALS
Outage Calls Received	245	362	148	126	75	956
ASA (seconds)	26	23	11	8	10	15.6
Staffing*						

*Staff assigned to handle outage calls also answered 911 calls. These calls go into a special queue dedicated to emergency management officials and are answered by JCP&L representatives who have been specially trained to handle calls from emergency management as well as local and municipal officials.

APPENDIX B

COMPANY PRESS RELEASES